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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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MAY 27 1999

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of

Implementation of the Local Competition
Provisions in the Telecommunications Act
of 1996

CC Docket No. 96-98

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ERRATUM

The Telecommunications Resellers Association ("TRA"), through undersigned counsel, hereby submits the following pages 16 through 21 to Appendix II, "Report of the Competitive Communications Group" for association with TRA's Comments filed in the above-referenced docket yesterday. These materials were included in TRA's electronically-filed Comments of May 26, 1999; however, they were inadvertently omitted from the paper copies of TRA's Comments filed with the Commission on that date.

Respectfully submitted,

By: Catherine M. Hannan
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May 27, 1999

Its Attorneys

DESCRIPTION OF COMPETITIVE COMMUNICATIONS GROUP'S SERVICES

Competitive Communications Group is a consulting firm that specializes in all areas of telecommunications, especially competitive local exchange carrier (CLEC) opportunities. CCG's mission is to provide traditional and cutting-edge solutions that support the long-term success of our clients in a competitive telecommunications environment.

CCG assists competitive local exchange carriers, Internet service providers, long distance resellers, and related companies in expanding into the competitive telecommunications arenas.

CCG develops business plans strategies, has negotiated interconnection agreements with all RBOCs, GTE and Sprint, has gotten clients certified in all 50 states, assists companies in unbundling their networks, and assists companies in the myriad detailed planning and implementation of the actual CLEC operation. This includes interface issues with the incumbent local exchange carrier, infrastructure development, development of marketing plans, billing problems and training.

WILLIAM H. TUCKER

As principal, William H. Tucker's primary responsibilities at Competitive Communications Group are Competitive Local Exchange Carrier (CLEC) market and financial assessment, operational implementation, Marketing Plans and Implementation and Employee Training Programs.

Mr. Tucker has been involved in the competitive local exchange business since early 1994. He has developed business plans for Competitive Local Exchange Carriers entering Tier 1 through Tier 4 markets, and utilizing bundled resale, unbundled network elements (UNEs) or facilities overbuilds as market entry strategies. He assists clients with determining strategic advantages, timelines, migration strategies, product sets, marketing strategies, sales distribution channels and more.

Prior to CCG, Mr. Tucker was Director for Business Development for Frontier Corporation, with responsibilities for implementation of new business opportunities, business plans and multi-company strategic partnering, including the turn key establishment of Frontier's first full scale "one-stop shop" Competitive Local Exchange Carrier (CLEC) operation.

Mr. Tucker also gained substantial operational experience as the General Manager for all North Dakota operations with Frontier. This included complete P&L responsibility for local telephone operations (25,000 access lines), a long distance division and an equipment sales and servicing division, including paging service and cellular equipment/sales. During that time, Mr. Tucker re-engineered the residential and business customer service departments, the business sales and support group, and developed marketing programs and product promotions to enhance the sales environment. This led to increased answer time performance, and dramatically increased CCF, voice mail, wire maintenance, Centrex and other product sales.

Mr. Tucker also has a regulatory and finance background within the telecommunications industry. This includes experience in developing rate cases, testifying on a variety of regulatory issues such as Price Caps and access charges; performing benchmark financial performance criteria against industry peer groups; and developing pricing / costing models for Frontier's subsidiary telephone companies to increase revenues and margins.

Mr. Tucker received a Bachelor of Business Administration Degree with concentrations in marketing and finance from the University of Notre Dame and holds a Masters of Business Administration Degree from State University of New York at Buffalo.

DOUGLAS A. DAWSON

As principal, Douglas A. Dawson's primary responsibilities at Competitive Communications Group are Competitive Local Exchange Carrier operational implementation, assessing long distance and wireless opportunities, accounting, and costing/pricing issues. Doug also is in charge of other numerous products such as developing optional calling plans, performing EAS and Measured EAS studies, strategic reviews of all opportunities, facility leases, and cross-subsidy studies.

The Implementation product line is quite diverse and is all-inclusive for a starting CLEC and includes such things as: negotiating interconnection agreements; filing for CLEC certification; negotiating collocation; creating and filing CLEC local, toll and access tariffs; project management from being on the CLEC team to running an implementation Gantt chart; setting prices; investigating the competition; developing costs of service; establishing a chart of accounts; and, establishing and implementing a testing plan.

Prior to CCG, Doug assisted independent telephone companies with projects involving jurisdictional separations studies (he re-wrote a Part 36 / 69 allocator into a windows based spreadsheet that many telephone companies are currently using), non-separations related cost studies, rate design, special projects, as well as many non-traditional competitively oriented ventures.

Doug also has operational experience as Director of Separations and Regulatory for CP National in Concord, California. There, Doug oversaw a large group that performed accounting, separations and traffic studies for a seven state area. This group also monitored earnings, filed rates and tariffs including rate cases, developed access and tariff rates, and monitored and commented in state and federal regulatory proceedings. Doug testified in a number of rate cases and regulatory proceedings in California, Nevada, Oregon and New Mexico. He also was responsible for earnings monitoring and rate case work for electric, gas and water properties.

Prior to that Doug worked as Staff Manager in Industry Relations at Southwestern Bell in St. Louis Missouri. His functions there included Bell rate case preparation, tracking issues that impacted Bell's relationships with the Independent Industry, calculating and negotiating various interconnection rates between companies for EAS and other arrangements, and the overseeing of the review of independent traffic and cost studies.

Doug received a Bachelor of Science in Accounting from the University of Maryland in 1977, and received a Masters of Mathematics from the University of California at Berkeley in 1985.

MICHAEL S. FOX

As principal, Michael S. Fox's primary responsibilities at Competitive Communications Group (CCG) are Competitive Local Exchange Carrier interconnection negotiations, business planning, strategic planning, wireless financial analyses and market assessments, regulatory support services, and industry relations support.

Throughout his career, Mr. Fox has assisted independent telephone companies (ITCs) on various regulatory, strategic planning, policy and business management aspects of the telecommunications industry. This includes working directly with ITCs as they navigate the changing telecommunications landscape. Mr. Fox has been particularly active in supporting ITCs in the evolving regulatory scene, including representing ITCs on industry committees designed to preserve and protect access and universal service revenues.

Previously, Mr. Fox was employed by Century Telephone Enterprises, Inc. (Century) as Director, Regulatory Affairs. In this capacity, Mr. Fox was responsible for all regulatory activity for Century's operating telephone subsidiaries. Mr. Fox was also the Chairman of the Louisiana Telephone Association regulatory committee and was a leader in many industry efforts involving independent telephone companies in Louisiana and other states.

Mr. Fox has testified before regulatory commissions in various proceedings in Arkansas, Colorado, Idaho, Indiana, Louisiana, Michigan, Minnesota, New Jersey, New Mexico, Tennessee and Wisconsin. In addition, Mr. Fox has represented independent telephone companies in formal and informal proceedings before the Federal Communications Commission (FCC) and state regulatory commissions in numerous states, including Arizona, Arkansas, Colorado, Idaho, Indiana, Kansas, Louisiana, Michigan, Mississippi, New Mexico, New Jersey, Ohio, Pennsylvania, Texas, Tennessee, Vermont and Wisconsin. Mr. Fox has represented (including expert testimony) independent telephone companies before these state commissions on numerous regulatory issues, including alternative regulation initiatives, authorized rates of return (return on equity return on total rate base and cost of capital considerations), capital recovery considerations, local and access rate design, new and enhanced regulated and non-regulated service offerings, and rate case planning.

Mr. Fox began his telecommunications career with Mountain Bell Telephone Company. He later worked for United Telecommunications, Inc. (United) and held various management positions with United (now Sprint), including Manager - LMS Development, Manager - Separations and Staff Manager - Revenue Planning. In 1989 Mr. Fox joined Kansas Independent Networks, Inc. (KINI) as Manager of Customer/Industry Relations. As part of the senior management team at KINI, he was involved in numerous aspects of the business, including strategic planning, network development, economic analysis, pricing, data systems,

Michael S. Fox
Continued

customer billing, customer service, regulatory relations and corporate development for cellular and network operations for the KINI group companies.

Mr. Fox received his Bachelor of Arts degree in Political Economy from the University of Wyoming in 1979, graduating summa cum laude. In 1981, he received a Master of Science degree in Economics, also from the University of Wyoming. Mr. Fox has also been a speaker at numerous industry forums and seminars.

TERRI K. FIRESTEIN

As Director of Regulatory Affairs, Terri K. Firestein's primary responsibilities at Competitive Communications Group are Competitive Local Exchange Carrier (CLEC) interconnection negotiations, CLEC implementation project management and local, toll and access Tariff development.

Before joining CCG, Ms. Firestein was Director, Carrier Management-Billing and Settlements for American Communications Services, Inc. (a facilities based CLEC now known as e.spire). Ms. Firestein was responsible for RBOC interconnection billing and settlements negotiations, implementation and concurrence. She was also responsible for the Carrier Access Billing department performance as a member of the ACSI Switch Implementation Team.

As a member of the switch implementation team, Ms. Firestein participated in the activation of ten (10) Lucent 5E switches, the successful implementation of interconnect agreements with Bell South, Southwestern Bell, US West and Bell Atlantic and the launch of switched and resale CLEC operations in ten (10) states.

Prior to ACSI, Ms. Firestein was Senior Consultant-Regulatory and Access Services for a large consulting firm and was responsible for their Tariff Services and Equal Access Balloting Services. Her eleven-year tenure at the firm included positions in the Traffic Department, Cost Separations Department and the Carrier Access Billing Department.

Ms. Firestein was educated at the University of Maryland, College Park.